REMARKS

Applicant's invention relates to a mobile terminal that communicates with a conventional circuit-switched network (referred to in the specification and claims as a multi-service network) and a packet data network (referred to in the specification as a best efforts network). Thus, the mobile terminal of the present invention is capable of both conventional voice and high speed packet data services. The application includes 70 claims, of which claims 1, 10, 25, 35, 48, and 64 are independent claims.

In conventional circuit-switched networks, the circuit-switched network pages the mobile station when there is an incoming call for the mobile station, and the mobile station must periodically register with the network so that the network can keep track of the mobile station's location for paging. The paging and registration messages generate significant signaling overhead in the circuit-switched network.

When the mobile station is engaged in a packet data session, the mobile station may not want to receive paging messages from the circuit-switched network for several reasons. First, the mobile station must leave the packet data channel to monitor for paging messages and to periodically register with the circuit-switched network, thus interrupting the packet data communications. Additionally, some cellular phones may not be capable of concurrent voice and packet data services. Currently, there is no way for the circuit-switched network to know whether the mobile station desires to receive paging messages for circuit-switched services.

According to the present invention, the mobile station includes a "do not disturb" function that can be selectively activated by the user, or may be automatically activated by the mobile terminal when the mobile terminal begins a packet data session. When the "do not disturb" function is activated, the mobile station may either de-register from the circuit-switched network, or send a message to the circuit-switched network while maintaining registration indicating that the mobile station does not wish to receive paging messages. By de-registering from the circuit-switched network, the mobile station does not have to interrupt the packet data transfer to

monitor the paging channel or perform a periodic registration. Further, by de-registering, the signaling overhead associated with paging and registration procedures is avoided.

The Examiner rejected each of the independent claims under 35 U.S.C. § 102 (b) as being anticipated by Haartsen. Haartsen discloses a mobile terminal that can operate in a public wireless communication network (hereafter "public network") or a private wireless communication network (hereafter "private network"). Both the public network and the private network are conventional circuit-switched voice communication networks. In Haartsen, the mobile terminal can de-register with the public network when it is within the range of the private network so that the voice calls are preferentially directed through the private network. When the mobile terminal in Haartsen de-registers from the public network, incoming calls are redirected through the private network to the mobile terminal using call forwarding. Thus, the de-registration in Haartsen is done for the purpose of redirecting voice communications through a preferred network.

The Haartsen patent does not anticipate the independent claims for several reasons. First, Haartsen discloses two networks providing essentially the same services, i.e., voice communication services, to the mobile terminal. In contrast, the claimed invention explicitly recites two distinct networks, a multi-service network providing circuit-switched communications and a best efforts network providing packet data communications. Haartsen fails to disclose a best efforts network and for that reason alone cannot anticipate the claims. Nor is there any suggestion or motivation in Haartsen to de-register the mobile terminal from a circuit-switched network when the mobile terminal is engaged in a packet data call. Although Haartsen discloses the broad concept of de-registering from one network, the motivation in Haartsen is to redirect the voice call through a second more preferred network. That motivation simply does not exist when the two networks offer distinct services as in the present case. The problems addressed by the present invention do not exist in the context of Haartsen. Thus, Haartsen does not teach or suggest the claimed invention.

For the reasons discussed above, it is believed that the present application is in condition for allowance and notice to such effect is respectfully requested.

Respectfully submitted,

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